



**MARK TWAIN**  
LONG DISTANCE, INC.

**EB-06-TC-060**

**CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Dear Secretary Dortch:

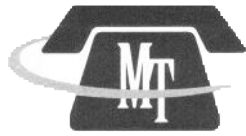
In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached our company's annual compliance certificate for the most recent period as required by section 64.2009(e) of the Commission's Rules together with a statement of our company's operating procedures established to ensure compliance with the Commission's Rules and Regulations regarding Customer Proprietary Network Information.

Should you have any questions regarding this filing, please direct them to Jim Lyon at 660-423-5211.

Sincerely,

William Rohde  
Executive Vice President & General Manager

cc: Bryon McCoy via e-mail [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
BCPI via email [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

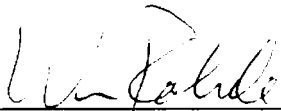
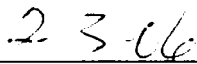


**MARK TWAIN**  
LONG DISTANCE, INC.

**ANNUAL CERTIFICATE OF COMPLIANCE AS REQUIRED BY SECTION  
64.2009(e) OF THE RULES AND REGULATIONS OF THE FEDERAL  
COMMUNICATIONS COMMISSION**

**MARK TWAIN LONG DISTANCE, INC.  
CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006  
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1. Mark Twain Long Distance, Inc. ("Mark Twain") (499 ID # 803690) is submitting this compliance certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223), pursuant to section 64.2009(e) of the Commission's rules.
2. Mark Twain does not use CPNI for marketing purposes. Accordingly, Mark Twain's personnel are trained not to use CPNI for such purposes. Because CPNI is not used for marketing purposes, Mark Twain has established the appropriate safeguards for this type of treatment (non-use) of CPNI data. These procedures include documentation of this policy in company procedures and training of company personnel with regard to non-use of CPNI data.
3. This certification is signed below by an officer of Mark Twain Long Distance, Inc., who has personal knowledge that Mark Twain has established procedures that are adequate to ensure compliance with the CPNI rules currently in effect and the statements contained in this filing are correct.

   
\_\_\_\_\_  
Name William Rohde Date  
Title Executive Vice President & General Manager

s/Via ECFS on 2/3/06; Original on file at Company



**MARK TWAIN**  
LONG DISTANCE, INC.

## **Statement of Explanation: CPNI Compliance**

This accompanying statement explains how Mark Twain Long Distance, Inc. operating procedures ensure that we are in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information - Part 64 of Title 47 of the Code of Federal Regulations.

Our Company has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with Section 64.2005 of the FCC's Rules and Regulations.

Mark Twain Long Distance, Inc. adheres to all CPNI rules as stated in Section 64.2001-64.2009 concerning the proper use of our customer's CPNI. Mark Twain Long Distance, Inc. does not use CPNI other than those legally allowable under Section 64.2005. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI;
- The implementation of an express disciplinary process for CPNI violations;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules.